

DMP:CRH/JMH/EHS
F. #2021R00183

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

----- X

UNITED STATES OF AMERICA

I N F O R M A T I O N

- against -

Cr. No. 21-CR-112 (PKC)
(T. 18, U.S.C., §§ 371 and 3551 et seq.)

JING RONG,
also known as “Rong Jing,”

Defendant.

----- X

THE UNITED STATES ATTORNEY CHARGES:

COUNT ONE

(Conspiracy to Act as an Agent of a Foreign Government
Without Prior Notification to the Attorney General)

1. In or about and between September 2016 and November 2019, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant JING RONG, also known as “Rong Jing,” together with others, did knowingly and willfully conspire to act in the United States as an agent of a foreign government, to wit: the People’s Republic of China (“PRC”), without prior notification to the Attorney General of the United States, as required by law, contrary to Title 18, United States Code, Section 951(a).

2. In furtherance of the conspiracy and to effect its objects, within the Eastern District of New York and elsewhere, the defendant JING RONG, together with others, did commit and cause the commission of, among others, the following:

OVERT ACTS

(a) On or about May 15, 2017, RONG, acting at the direction of the PRC government, contacted and attempted to hire a private investigator (the “PI”) to find Jane Doe, a person located in the United States whose identity is known to the United States Attorney.

(b) On or about May 17, 2017, a co-conspirator working at the direction of the PRC government sent RONG a document containing Jane Doe’s name and personal identifying information.

(c) On or about May 17, 2017, RONG provided the document containing Jane Doe’s name and personal identifying information to the PI.

(d) On or about May 22, 2017, RONG directed the PI to locate and conduct surveillance of Jane Doe for the benefit of the PRC government.

(e) On or about June 12, 2017, RONG provided instructions to the PI regarding the surveillance of Jane Doe, including directing the PI to videotape Jane Doe so that RONG could provide the video to PRC government officials.

(f) On or about June 29, 2017 and July 14, 2017, RONG met with the PI and accepted photographs and surveillance information about Jane Doe, which RONG intended to provide to PRC government officials.

(Title 18, United States Code, Sections 371 and 3551 et seq.)

COUNT TWO

(Conspiracy to Engage in Interstate Stalking)

3. In or about and between September 2016 and November 2019, both dates being approximate and inclusive, within the Eastern District of New York and

elsewhere, the defendant JING RONG, also known as “Rong Jing,” together with others, did knowingly and willfully conspire to travel in interstate and foreign commerce, to wit: (i) from the PRC to New Jersey, and from New York to New Jersey, with the intent to harass and intimidate John Doe, an individual whose identity is known to the United States Attorney, and (ii) from the PRC to California, with the intent to harass and intimidate Jane Doe, who is the adult daughter of John Doe, and in the course of and as a result of such travel, engage in conduct that caused, attempted to cause and was reasonably expected to cause John Doe and Jane Doe substantial emotional distress, contrary to Title 18, United States Code, Section 2261A(1)(B).

4. In furtherance of the conspiracy and to effect its objects, within the Eastern District of New York and elsewhere, the defendant JING RONG, together with others, did commit and cause the commission of, among others, the following:

OVERT ACTS

(a) On or about and between April 3, 2017 and April 5, 2017, several co-conspirators traveled to the United States from the PRC with John Doe’s father.

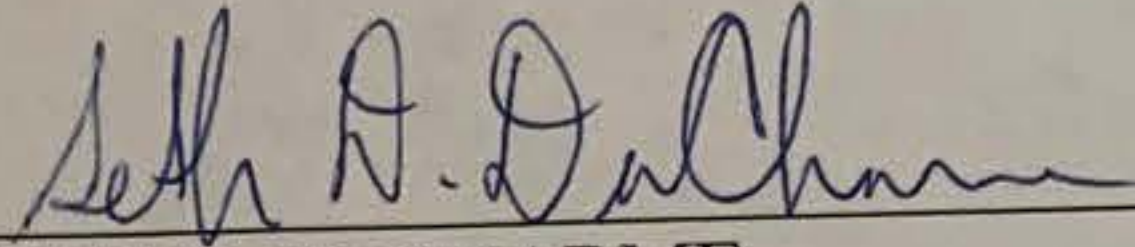
(b) On or about April 5, 2017, several co-conspirators brought John Doe’s father to a residence in New Jersey belonging to a relative of John Doe, and directed John Doe’s father to attempt to compel John Doe to travel to the PRC against his will.

(c) On or about May 22, 2017, RONG directed the PI to locate and conduct surveillance of Jane Doe.

(d) In or about and between April 2018 and July 2018, a co-conspirator sent unsolicited and derogatory messages about Jane Doe and Jane Doe’s family members to associates of Jane Doe.

(e) On or about September 4, 2018, two co-conspirators traveled to John Doe's residence in New Jersey and left several handwritten notes that contained threatening messages demanding that John Doe return to the PRC.

(Title 18, United States Code, Sections 371 and 3551 et seq.)

A handwritten signature in blue ink, appearing to read "Seth D. DuCharme", is written over a horizontal line.

SETH D. DUCHARME
ACTING UNITED STATES ATTORNEY
EASTERN DISTRICT OF NEW YORK

F.#: 2021R00183
FORM DBD-34
JUN. 85

No.

UNITED STATES DISTRICT COURT

EASTERN *District of* NEW YORK

CRIMINAL DIVISION

THE UNITED STATES OF AMERICA

vs.

JING RONG,

Defendant.

INFORMATION

(T. 18, U.S.C., §§ 371 and 3551 et seq.)

A true bill.

Foreperson

Filed in open court this _____ day,

of _____ A.D. 20 _____

Clerk

Bail, \$ _____

***Craig R. Heeren, J. Matthew Haggans, Ellen H. Sise,
Assistant U.S. Attorneys (718) 254-7000***